

~~1245~~ WE-1 United States District Court 6 ~~30~~

EASTERN

DISTRICT OF

MICHIGAN

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

CASE NUMBER:

KEITH GOODWIN, aka "Kaydoe"

07-30180

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January-March 2007 in Wayne county, in the Eastern District of Michigan defendant did,

employ, use, persuade, induce, entice, or coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction would be transported in interstate or foreign commerce, or that such visual depiction was produced using materials that have been transported in interstate or foreign commerce,

in violation of Title 18 United States Code, Section(s) 2251(a), and, on or about March 28, 2007, did

possess a firearm, to wit: a Mossberg Model 88 Maverick 12-gauge shotgun which has had the importer's or manufacturer's serial number removed, obliterated, or altered and has been shipped or transported in interstate commerce.

in violation of Title 18 United States Code, Section(s) 922(k)

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

(SEE ATTACHED AFFIDAVIT)

MAR 29 2007

Continued on the attached sheet and made a part of the  
CLERK'S OFFICE  
DETROIT

☒ Yes☐ No

  
Special Agent Michael Glennon

Sworn to before me and subscribed in my presence,

March 29, 2007at Detroit, Michigan

  
The Honorable Virginia A. Morgan  
United States Magistrate Judge

AFFIDAVIT

Michael R. Glennon, being duly sworn, deposes and states the following:

1. I make this affidavit from personal knowledge based on my participation in this investigation, with exception of the matters expressly stated, which are based on information received from other law enforcement officials and/or their reports and records. The information outlined below is provided for the limited purpose of establishing probable cause, and does not contain all details or facts that exist pertaining to the investigation.
2. I have been employed as a Special Agent with the Federal Bureau of Investigation for over three years. I am currently assigned to investigate violent crime matters, as well as investigations involving crimes against children.
3. I am currently involved in an investigation on a subject identified as KEITH GOODWIN, aka "Kaydoe," who currently resides at 13592 Goddard Street, Detroit, Michigan.
4. This investigation to date has identified Keith Goodwin (aka "Kaydoe") as a pimp pandering minors and adults in the greater Detroit, Michigan area. Kaydoe promotes his prostitution business, among other ways, by advertising his prostitutes on the website [www.craigslist.org](http://www.craigslist.org).

5. On March 8, 2007, a Southwest Michigan Crimes Against Children (SEMCAC) Task Force Officer from the Wayne County Sheriff's Department (WCSD), contacted the Detroit FBI regarding an arrest that was made as part of an undercover prostitution enforcement operation. Agents from Detroit FBI responded to the scene and were advised that a 16-year old black female was taken into custody for accosting and soliciting another for an act of prostitution (hereinafter referred to as "the Juvenile"). The Juvenile identified her pimp as "Kaydoc."
6. The Juvenile stated that her image was posted under the name of "Sapphire" on the "Erotic Services" section of Craigslist. She also identified Kaydoe's telephone number as (248) 796-2530.
7. On March 13, 2007, a search for Goodwin's telephone number (248) 796-2530 was conducted at [www.craigslist.org](http://www.craigslist.org). The search yielded fourteen (14) entries made under the Detroit Metro Craigslist Erotic Services section. These advertisements included descriptions of females, photographs of females, and rates of service for time spent with the females. Among the advertisements with Goodwin's telephone number were advertisements for the Juvenile and for another young black female, with the name Ices.

8. Among the postings under Goodwin's telephone number, was an advertisement read as follows: "ICES IS HERE 6'2" CALL NOW.. (248)796-2530 - w4mw - 21. LEAVE WITH A SMILE IN 15 MINUTES FOR 100. IF YOU ARE IN A HURRY, LEAVE QUICK WITH A SMILE (248)796-2530." Along with the message were two photographs of a young black female. In one of those photographs, the female is laying on a bed with her legs spread open and her genitalia exposed.
9. On March 28, 2007, pursuant to an authorized federal search warrant, Goodwin's residence at 13592 Goddard Street, Detroit, Michigan, was searched. Keith Goodwin was at the residence when agents and task force officers arrived to execute the warrant. Also at the residence were five females, three of which were under the age of 18. One of the three underage girls was identified as the female who advertised under the name "Ices." When this underage female was shown the advertisement described above in paragraph 8, she acknowledged that her street name is Ices and that the photographs in the advertisement were of her.
10. Ices was interviewed. She admitted that Kaydoe took the photographs contained in her advertisements on Craigslist and indicated that the bedroom in which these photographs were taken is at the Goddard Street residence. Ices also stated that Kaydoe uploads the photographs onto the advertisements on Craigslist.

11. During the execution of the search warrant at the Goddard residence, agents found three desktop computers. Only one of the three computers appeared to be connected to the electrical outlet and active. A search of that computer revealed several hundred pornographic images, including several of Ices and Sapphire. The photographs from the advertisement for Ices described in paragraph 8 above were contained on this computer.
  
12. Also found at the Goddard Street residence of Goodwin was a Mossberg Model 88 Maverick, 12-gauge Shotgun, with the butt stock removed and a handle grip installed. This shotgun had the manufacturer's serial number scratched off, with only some of the numbers remaining visible. This firearm was found behind a couch in the living room area of the Goddard residence. Representatives of the Mossberg firearm company indicated that all Model 88 Maverick 12-gauge shotguns are manufactured in Texas.

13. Based on the above stated facts, I have probable cause to believe that Keith Goodwin did knowingly produce images of child pornography knowing that such images would be transported in interstate commerce via computer, in violation of Title 18, United States Code, Section 2251(a), and did knowingly possess a firearm with the importer's or manufacturer's serial number removed, obliterated, or altered, in violation of 18 United States Code Section 922(k).

Special Agent Michael R. Glennon  
Federal Bureau of Investigation

Sworn and subscribed before me on this 29th of March 2007.

  
UNITED STATES MAGISTRATE JUDGE  
HONORABLE JUDGE VIRGINIA A. MORGAN